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7 *Attorneys for Debtors and Reorganized Debtors*

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9 **UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN FRANCISCO DIVISION**

11 **In re:**

12 **PG&E CORPORATION,**

13 **- and -**

14 **PACIFIC GAS AND ELECTRIC**  
15 **COMPANY,**

16 **Debtors.**

- 17 ☐ Affects PG&E Corporation  
18 ☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

19 *\* All papers shall be filed in the Lead Case, No.*  
20 *19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REQUEST FOR ORDER BY DEFAULT AS  
TO REORGANIZED DEBTORS'  
OBJECTION TO CLAIM (CLAIM NO. 58462,  
FILED OCTOBER 17, 2019, OF SPIRO  
JANNINGS)**

**[Re: Dkt. No. 11388]**

**Regarding Objection Set for Hearing  
January 18, 2022, at 10:00 a.m. (Pacific Time)**

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The Objection seeks to disallow and expunge the claim of Spiro Jannings (“**Claimant**” or “**Mr. Jannings**”), Claim No. 58462, filed October 17, 2019 (the “**Proof of Claim**” or “**Claim**”).

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Mr. Jannings' bankruptcy counsel first approached counsel for the Reorganized Debtors on October 23, 2021, three days before the initial response deadline on the Claim Objection, to request a continuance of the response deadline, explaining that he had recently been retained as bankruptcy counsel by Mr. Jannings. As a courtesy, the Reorganized Debtors agreed to continue the response deadline and hearing date for three months. By agreement of the parties, the response deadline on the Claim Objection was continued to January 4, 2022, at 4:00 p.m., and the hearing was continued to

1 January 18, 2022, at 10:00 a.m. [Docket No. 11488].

2 On December 28, 2021, Mr. Jannings filed a *Motion to Dismiss and Abstain* [Docket No.  
3 11753] (the “**Abstention Motion**”), which requests that the Court abstain from adjudicating the Proof  
4 of Claim but does not respond to the Objection. The Abstention Motion has not been set for hearing.

5 On December 30, 2021, Mr. Jannings filed the *Ex Parte Application to Enlarge Time* [Docket  
6 No. 11768] (the “**Motion to Extend Time**”), seeking to continue and vacate the response and hearing  
7 dates with respect to the Objection. On December 31, 2021, the Reorganized Debtors opposed the  
8 Motion to Extend Time [Docket No. 11775] (the “**Opposition to Motion to Extend Time**”). That  
9 same day, the Court issued a docket text order denying the Motion to Extend Time for the reasons  
10 stated in the Opposition to Motion to Extend Time and keeping the hearing on the Objection on the  
11 January 18, 2022, calendar.

12 As further explained in the below *Declaration of No Opposition Received*, the deadline to file a  
13 response or opposition to the Objection was not further extended and remains January 4, 2022, at  
14 4:00 p.m.

15 The deadline to file a response or opposition to the Objection has passed, and Mr. Jannings did  
16 not file a response to the Objection.

17 **DECLARATION OF NO OPPOSITION RECEIVED**

18 The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

19 1. I am an attorney with the law firm of Keller Benvenuti Kim LLP, co-counsel for the  
20 Reorganized Debtors.

21 2. On December 31, 2021, at 10:40 a.m., following the Court’s denial of the Motion to  
22 Extend Time, I received an email from Michael St. James, bankruptcy counsel for Mr. Jannings,  
23 requesting an unspecified extension on Mr. Jannings’ time to respond to the Objection. At 11:32 a.m.  
24 that same day, I responded to Mr. St. James by asking how much time he needed and telling him that  
25 while the Reorganized Debtors might be amenable to a short extension of an extra day or so, I did not  
26 think that the Reorganized Debtors would agree to further continue the hearing on the Objection. At  
27 11:55 a.m. that same day, Mr. St. James stated that he would inquire with Mr. Jannings’ employment  
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1 counsel as to how much time was needed. I did not hear further from Mr. St. James with respect to his  
2 request for an extension. Attached as **Exhibit A** hereto is a true and correct copy of my email exchange  
3 with Mr. St. James on December 31, 2021.

4 3. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no  
5 responses have been filed to the Objection.

6 4. This declaration was executed in San Francisco, California.

7 WHEREFORE, the Reorganized Debtors hereby request entry of an Order sustaining the  
8 Objection and disallowing and expunging the Proof of Claim.

9 Dated: January 11, 2022

**KELLER BENVENUTTI KIM LLP**

10 By: /s/ Jane Kim  
11 Jane Kim

12 *Attorneys for Debtors and Reorganized Debtors*  
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